

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF VERMONT**

IN RE: )  
)  
CORPORATION OF SOUTHERN ) Case No. 20-10212-cab  
VERMONT COLLEGE, INC., ) *Chapter 7 Case*  
dba SOUTHERN VERMONT COLLEGE, )  
)  
Debtor. )

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**EMERGENCY MOTION FOR ORDER OF DISMISSAL OR  
ALTERNATIVELY ABANDONMENT OF PROPERTY**

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Now comes Raymond J. Obuchowski, Esq. the Chapter 7 Trustee and respectfully requests this Court for an emergency hearing for dismissal of Chapter 7 case or alternatively abandonment of the Campus property and in support of the Motion states as follows:

1. On June 30, 2020 the Debtor filed the petition for relief, Movant was appointed interim trustee.
2. Prior to the filing the Debtor entered on Occupancy Agreement which provided that possession and maintenance of certain properties of the Estate were to be in the control of a proposed Buyer of the Campus properties of the Estate. Under such Agreement, the Buyer would be able to conduct operations on the property including a summer camp.
3. On the morning of July 3, 2020 the Trustee was made aware that the Buyer intends to commence a summer camp with possible 350 to 400 campers to arrive Sunday July 5, 2020, to occupy the property of the Estate, and as of the preparation of this

Motion the Trustee has not been provided adequate information to verify performance under the Agreement, and confirmation for insurance, and other related verification of permits, approvals and issues addressing Covit 19 concerns.

4. Upon information and belief, the anticipated camp did not receive approvals nor was there any immediacy to the inherent issues, as the approvals were purported received Thursday afternoon, July 2<sup>nd</sup>.

5. The Trustee has immediate concerns as to the inherent risks of parties on the Estate property without adequate insurances, waivers on Covit 19 issues, and verification of all approvals, and without all of the above, and additional concerns, the estate is at risk with unknown liabilities.

6. The anticipated camp either needs to be cancelled until all requirements have been met, and concerns addressed or alternatively the case could be dismissed or the property abandoned.

7. In order for the camp and the Agreement to proceed the Trustee would further need an operating order under 11 U.S.C. §721.

WHEREFORE the Trustee requests an emergency hearing on this Motion to Dismiss or Alternatively Abandon Estate property, and such other and further relief as the Court deems just and proper.

DATED at Royalton, Vermont this 3rd<sup>t</sup> day of July 2020.

**BANKRUPTCY ESTATE OF  
CORPORATION OF  
SOUTHERN VERMONT  
COLLEGE, INC.**

By: /s/ Raymond J. Obuchowski  
Raymond J. Obuchowski, Esq.  
Chapter 7 Trustee  
Obuchowski Law Office  
PO Box 60; 1542 VT Route 107  
Bethel, Vermont 05032  
Telephone: 802-234-6244  
Facsimile: 802-234-6245  
ray@oeblaw.com